

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	NO. 3:18-CR-0097
v.	:	
	:	(MARIANI, J.)
ROSS ROGGIO, and	:	
ROGGIO CONSULTING, LLC,	:	
Defendants.	:	

**GOVERNMENT’S *IN LIMINE* MOTION TO INTRODUCE
THE TESTIMONY OF ROGGIO’S EX-SPOUSE**

The Government, by and through undersigned counsel,
respectfully moves *in limine* for the Court to issue an Order that allows
the Government to present the testimony of the defendant’s ex-wife
Krisi Merring-Roggio, and in support thereof states:

1. The Government intends to introduce the testimony of
Kristy Merring-Roggio, who was Roggio’s spouse at the time of the
offenses alleged in the Superseding Indictment. Roggio and Kristi
Merring-Roggio are now divorced.
2. Kristi Merring-Roggio lived at the marital home located at
143 Indian Spring Drive, Stroudsburg, Pennsylvania, in February 2016.
She will testify that in February 2016, when Roggio was living and
working in Iraq, he ordered items to be delivered to 116 Turkey Hill

Road, Stroudsburg, Pennsylvania – which was both the home of Roggio’s parents and the business location of Roggio Consulting LLC. Kristi Merring-Roggio will testify that Roggio requested her to take items he purchased and combine them to be shipped to Iraq. Kristi Merring-Roggio will explain that, at Roggio’s request, she took the items – including rifling buttons – to a local shipper named “The Packaging Place,” located in East Stroudsburg, Pennsylvania, and mailed these items to “Ross Roggio, Baharan Residential Complex, Building Floor 2, Office 10, Sulaymaniyah, Kurdistan Region of Iraq.”

3. Kristi Merring-Roggio will also testify that Roggio had no other sources of income during the relevant time frame of the Superseding Indictment and that he purchased several expensive items including Rolex watches, exotic sports cars, and high-end firearms.

Dated: April 10, 2023

Respectfully submitted,

GERARD M. KARAM
UNITED STATES ATTORNEY

/s/ Todd K. Hinkley
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/s/ Scott A. Claffee

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U.S. Department of Justice
Counterintelligence and Export
Control Section

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That on April 10, 2023, he served a copy of the attached **GOVERNMENT'S MOTIONS IN LIMINE** by electronic means to:

Gino Bartolai
bartolai@ptd.net

/s/ Todd K. Hinkley
Todd K. Hinkley
Assistant United States Attorney

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CERTIFICATE OF NON-CONCURRENCE

The undersigned hereby certifies that he attempted to speak to Gino A. Bartolai, Esquire, counsel for Ross Roggio concerning the defendant's concurrence/non-concurrence in the attached motions *in limine*. Attorney Bartolai indicated that the defense does not concur in the attached motion.

/s/ Todd K. Hinkley

Todd K. Hinkley

Assistant United States Attorney